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October 15, 2003

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
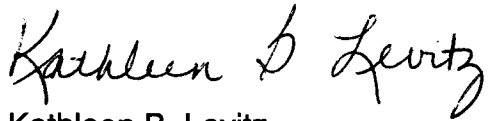445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 95-116

Dear Ms Dortch:

This is to inform you that on October 14, 2003, Bill Shaughnessy, Mike Donze and I, all representing BellSouth, met with John Muleta, David Furth, Catherine Seidel, Jennifer Tomchin, and Jared Carlson of the Commission's Wireless Telecommunications Bureau and subsequently with Bill Maher, Carol Mattey, Josh Swift, Eric Einhorn and Cheryl Callahan of the Commission's Wireline Competition Bureau. The purpose of our meeting was to discuss why the Commission needed to conduct a further rulemaking with NANC involvement prior to changing the rule that governs how quickly a wireline carrier must complete those ports of telephone numbers categorized as simple ports. As part of the presentation we described the steps involved in porting a telephone number and the intervals associated with each of those steps. The attached document formed the basis for our presentation.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place it in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachment

cc: John Muleta   Bill Maher
       Catherine Seidel   Carol Mattey
       Jennifer Tomchin   Josh Swift
       David Furth   Eric Einhorn
       Jared Carlson   Cheryl Callahan

Wireline Porting Intervals

BellSouth Corporation

CC Docket 95-116

October 14, 2003

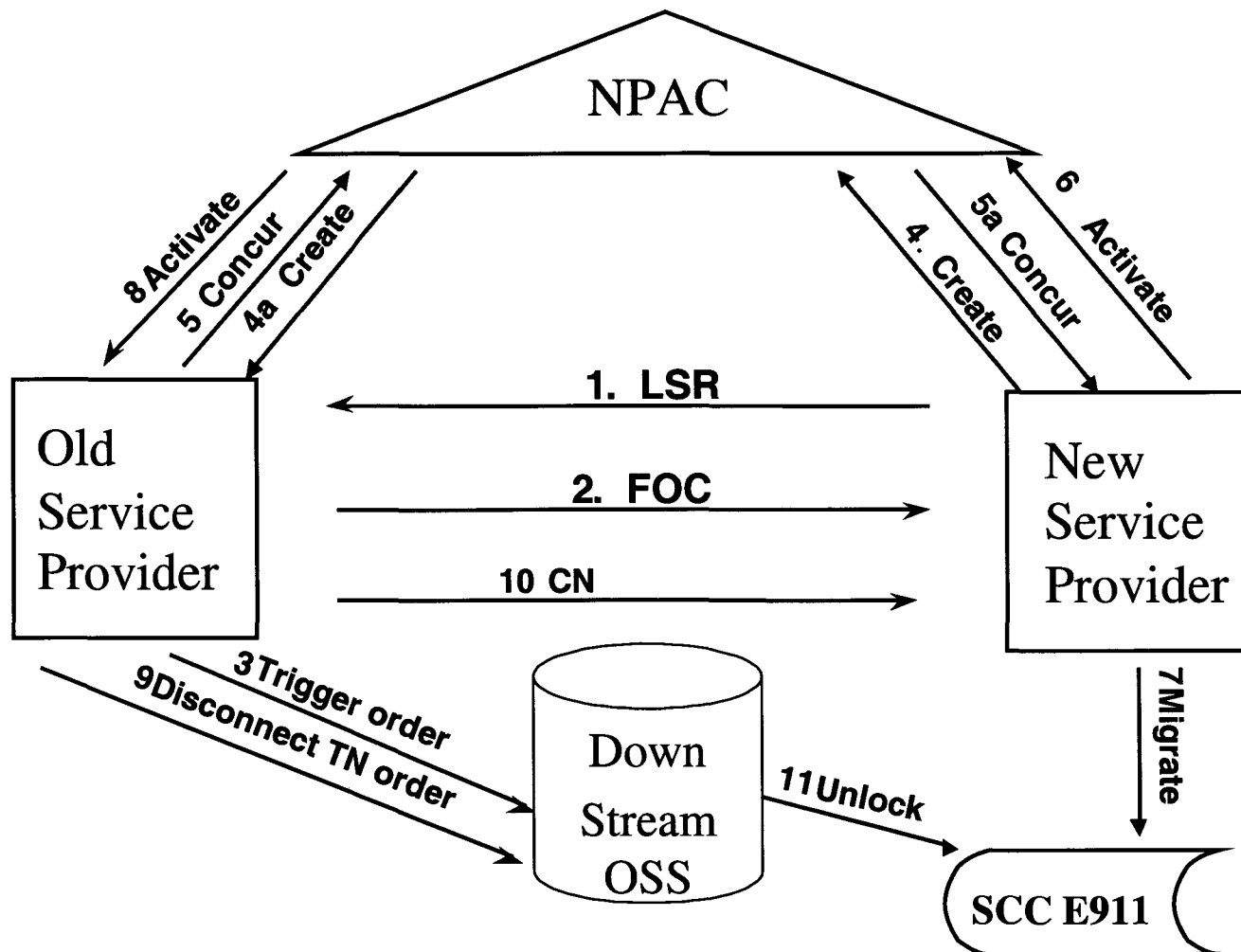# *Wireline Porting Intervals Under Existing Commission Rules*

- FCC rules state that LNP administration shall comply with the recommendations of the NANC's Local Number Portability Administration ("LNPA") Selection Working Group, dated April 25, 1997 and its appendices. (See 47 C.F.R. § 52.26(a)).

- The NANC recommendation allows for a wireline porting interval of three days following the receipt of a Firm Order Confirmation (FOC).

- Any interval changes different from the current rules must be promulgated through a proper rulemaking with notice and comment.

- The Commission cannot reasonably order changes to wireline porting intervals without recognition of the changes' impacts to operating support systems.

- It is in the best interest of consumers and carriers – both wireline and wireless – that such changes occur only after the industry has adopted uniform changes to existing process flows and individual carriers have had a reasonable time to reconfigure their operations support systems to support those changes.

Wireline Porting Intervals

- The current wireline porting interval as adopted by the wireline industry and the FCC is based on:
  - Finalizing the Firm Order Completion (FOC) date within 24 hours of receipt of a porting request and completing a simple port in three business days from the FOC date.

- The existing interval was adopted so service providers would have sufficient time to address errors and concerns with the porting request.

Overview of Wireline Porting Intervals

Key Points About Wireline Porting Intervals

- LSR and FOC exchange (Steps 1 & 2):
  - Electronic LSR with no errors: the FOC will be sent back in less than three hours.
  - LSR received electronically and dropped for manual handling may take from 7 to 10 hours to return FOC.
  - Manual (FAXed) LSRs may take up to 24 hours to return FOC.
  - Simple ports will be completed in three days of FOC return.

- Trigger Order w/ zero due date and Creation of SV by New SP (Steps 3 & 4)
  - Once the FOC is received, the new SP sends a create SV to the NPAC.
  - The 10 digit trigger forces a query on any number that has been ported even if the disconnect process is not complete.

- Create SV Sent to Old SP and Old SP sends Concur Message to NPAC (Steps 4a & 5)
  - The existing flows have a period of two business days for old SP concurrence.

Key Points About Wireline Porting Interval

- New SP receives concurrence from NPAC & New SP Sends Activate Message to NPAC (Steps 5A & 6)
  - A broadcast message from NPAC to SPs so they can update their databases occurs.
  - A period of "mixed service" condition exists for as long as it takes old SP to disconnect the ported TN.

- Activate Message Sent to Old SP (Step 8)
  - Receipt of activate message trigger disconnect Order

- Disconnect Order Issued by Old SP (Step 9)
  - Once old SP receives activate message, disconnect orders are sent to to downstream systems.
  - Billing records are updated via a batch process & E911 cleanup is initiated.

Key Points About Wireline Porting Interval

- The existing flows allowed a period of 2 business days for old SP concurrence.

- The time to return the FOC is less than three hours when fully mechanized and no LSR errors

- Regardless of the port intervals, if activation of the port is done prior to the complete TN disconnect by the old SP, a "mixed service" condition exists.

Summary

- The FCC should not change wireline porting intervals without a demonstrated need.
  - No evidence exists that existing intervals will hinder inter-modal porting.

- If the Commission is contemplating changing wireline porting intervals it must first initiate a rulemaking.

- LNP ports may be handled in less than 4 days if the LSR is fully mechanized and error free and the FOC is received in less 24 hours.
  - However, shortening the interval to less than 3 business days from FOC requires changes to operation support systems.

- BST systems that handle LNP processes are currently designed to meet the interval standards prescribed in Section 52.26(a) of the Commission's rules:
  - An FCC decision to mandate shorter intervals for inter-modal porting would require BellSouth to implement software changes. These changes can not be made prior to 11/24/03.